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REMARKS

Claims 1-26 were previously presented in the above-identified application. Upon entry of this response, which amends claim 3, claims 1-26 remain pending. Applicant respectfully requests reconsideration of the rejections in view of the claim amendments and the following remarks. No new matter has been added with this response.

Section 112: Second Paragraph.

Previously presented independent claims 1, 15, 16, 19, 22, 25 and 26 and dependent claims 2-14, 17, 18, 20, 21, 23 and 24 have been rejected under 35 U.S.C. §112 ¶ 2 as being indefinite for failing to particular point out and distinctly claim the subject matter that the Applicant regards as the invention.

First, the Office Action at p. 2 intimates that the term "including," such as with respect to either "'including an identifier' or 'including an alternate address' into the SNMP trap," does not sufficiently describe an address conversion apparatus. In particular, the Office Action states that the purpose of a converter is to "change an item from one form to another" (i.e., "converting") and that by "attaching an additional item to the original item" is an inherent contradiction to "converting." Applicant respectfully disagrees that the term "conversion" (or converting) is so limited in meaning that, for example, "attaching an additional item to [an] original item" to form a new item cannot be described as converting. Further, the Office Action proffers no intent by the Applicant to exclude "including" or "attaching" or "adding" from the scope of the term "converting."

Rather, the Applicant interprets the term "conversion" more broadly than is being suggested. For example, "[c]onverter 210 converter 210 can include information . . . in the second trap." (emphasis added). See Specification at ¶ 64; see also e.g., ¶¶ 74 and 77. As another example, "[c]onverter 210 adds the lower one byte in agent address part . . . the added value is . . . in the second trap." (emphasis added). See Specification at ¶ 70. Moreover, the

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Applicant submits that the above-described functionality of a converter to change an item from one form to another is not incongruous with terms "including" or "attaching" or "adding." As such, the Applicant believes that this rejection is obviated for both the independent and dependent claims.

Second, claim 3 has been rejected for having insufficient antecedent basis. Applicant is amending claim 3 to now recite ". . . a predetermined part of a time stamp part . . . ," thereby overcoming this rejection.

Section 103(a): Gbadegesin.

Claims 1, 15 (presumably), 16, 19, 22, 25, and 26 have been rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,104,868 ("Peters") in view of U.S. Patent No. 6,754,709 ("Gbagdegsin"). Applicant respectfully traverses this rejection for at least the following reasons.

Claims 1, 15, 16, 19, 22, 25, and 26.

Applicant respectfully submits that Peters in combination with Gbagdegsin fails to disclose each of the elements set forth in claim 1. For example, claim 1 recites "a converter that generates a second SNMP trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network." Claims 15, 16, 19, 22, 25, and 26 include elements generally similar to claim 1. Independent claim 1 recites, among other things, an address conversion apparatus including a converter that generates a second trap. In accordance with at least one embodiment of the claimed converter, for example, disposing such address conversion apparatus in a network with a monitoring apparatus provides a more effective way to identify a particular terminal located within the network. See e.g., FIGs 5A to 5C and attendant description in the Specification.

In page 3 of the Office Action, the Examiner asserts that Gbadegesin teaches "generating a second trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network." The Applicant respectfully submits that Gbadegesin fails to teach

or even suggest the above-mentioned element, and therefore, Gbadegesin and Peters do not disclose or suggest the combination set forth in claim 1.

As support for the assertion that Gbadegesin's "modifying a source address from a first network in packet of transmission to a second network" teaches "generating a second trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network," the Office Action on p. 3 cites the Abstract and column 6 lines 30-67 and column 7 lines 15-35. Specifically, Gbadegesin teaches "a generalized network address translator (gNAT) at kernel level that is under user-mode proxy control through a proxy application programming interface (API)" in the Abstract, lines 5-6. Further, Gbadegesin at column 6 lines 40-47 discloses that "the system of the instant invention allows a transparent proxy application 104 to request that a network gateway modify the source and/or destination address of a given network session in a manner transparent to the original source host and/or the replacement destination host. This ability made available by the instant invention allows true intelligent proxy-controlled arbitrary redirection on network sessions. While the application process 104 is illustrated in the user-mode, it should be recognized by those skilled in the art that the invention is not so limited to only user-mode applications." Gbadegesin continues at column 7 lines 17-21: "the system of the instant invention comprises a kernel-mode translation module 106 that processes packets received from the network and modifies those packets in real-time in accordance with dynamic redirect instructions from the transparent proxy 104. The system further includes a user-mode application programming module 108 that implements the interface invoked by transparent proxy 104."

Although these citations of Gbadegesin disclose modifying a source and/or destination address, they do not suggest or hint at "a converter that generates a second SNMP trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network." The Applicant requests that the Examiner provide other citations if Gbadegesin so teaches or suggests this claim element. For at least these reasons, the Applicant believes claim 1 is distinguishable from Gbadegesin, whether considered alone or in combination with other cited art, and thus is patentable. Claims 15, 16, 19, 22, 25, and 26 are distinguishable from Gbadegesin as they too recite similar novel and nonobvious elements.

Accordingly, Applicant respectfully submits that claims 1, 15, 16, 19, 22, 25, and 26 are patentable and thus are now in condition for allowance. As claims 2-14, 17, 18, 20, 21, 23 and 24 depend from allowable claims 1, 15, 16, 19, 22, 25, and 26, these dependent claims are patentable for at least the same reasons. Therefore, an indication of allowable subject matter is respectfully requested for claims 1-26.

Section 103(a): Veerina.

Claims 4, 7, 14, 18, 21 and 24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Peters in view of Gbadegesin, and in further view of U.S. Patent No. 6,243,379 ("Veerina"). Applicant respectfully submits that this rejection is obviated for at least the following reasons.

Claims 2, 4, 5, 7, 14 and 18.

Applicant respectfully disagrees that Veerina teaches or suggest any more than merely translating an IP address to an external IP address to allow transmission to an external network. This fails to teach the feature of the converter as claimed. Further, Gbadegesin fails to teach or suggest "a converter that generates a second SNMP trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network." Regardless, claims 2, 4, 5, 7, 18, 21, and 24 depend from allowable claims. And as such, all these dependent claims are patentable for at least the reasons set forth above.

Section 103(a): Spencer.

Claims 3, 6, 13 and 17 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Gbadegesin in further view of Veerina in view of U.S. Patent No. 6,253,243 ("Spencer").

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After entry of this Amendment, Applicant respectfully submits that this rejection is obviated for at least the following reasons.

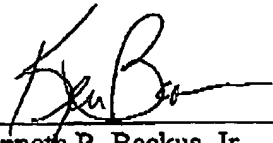### Claims 3, 6, 13, 17, 20 and 23.

Applicant respectfully disagrees that Spencer teaches or suggest any more than merely an SNMP trap with a timestamp field. Further, Gbadegesin fails to teach or suggest "a converter that generates a second SNMP trap upon including an identifier in said first SNMP trap for identifying a terminal located in the first network." Regardless, claims 3, 6, 13, 17, 20 and 23 depend from allowable claims. And as such, all these dependent claims are patentable for at least the reasons set forth above.

In sum, all of the independent claims and their associated dependent claims should be in a condition for allowance, which is respectfully solicited. If the Examiner believes that any of the claims are not in a condition for allowance, the Examiner is encouraged to contact the undersigned to resolve any outstanding issues.

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